



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8960

August 14, 2020

Via Delivery as Email-attachment

Mr. Prashant K.
Gupta

Honeywell, Inc.
115 Tabor Road
Morris Plains, NJ 07950

Dear Mr. Gupta:

The purpose of this letter is to approve your submission of the "Site Characterization Summary Report Revision 1 Operable Unit 2 (OU2) Site-Wide Groundwater and Cell Building Area for the LCP Chemicals Site, Brunswick, Georgia," dated July 2020 (hereinafter referred to as the OU2 Revised SCSR). The OU2 Revised SCSR addresses the majority of issues discussed previously and is considered final. One issue remains and must be addressed appropriately in the upcoming OU2 Remedial Investigation Report. The State of Georgia comment regarding Figures 5.2—5.4 and 5.8 in the OU2 Revised SCSR is not considered resolved. Once a full Remedial Investigation and Feasibility Study as required under the 1995 Administrative Order by Consent for Remedial Investigation/Feasibility Study (RI/FS) is developed, figures must be presented that properly address the comment.

As stated in the comment, some detection levels reported from the lab are above the Maximum Contaminant Level (MCL), but are color coded in the figures as non-detect. As a result, the graphical depiction of contamination does not show these possible detections. In instances where detection limits are above the MCL, the color-coding should reflect contamination, consistent with risk assessment methodology that requires evaluation of constituents where detection limits are above a screening level. EPA requests figures be included in the RI that address the issue of laboratory detection limits above the MCL as exceedances in order to not have a misleading depiction of groundwater contamination.

Since all other comments have been addressed and the requested well list is being sampled, EPA requests a schedule be developed and presented to EPA for submittal of the RI (including a Baseline Risk Assessment (BRA)) and the FS by September 30, 2020 or earlier. As stated in earlier correspondence, it is EPA's expectation that a Draft RI be submitted no later than early 2021. It is EPA's goal to finalize the RI during 2021

(including a Baseline Risk Assessment) and have a Draft Feasibility Study (FS) submitted no later than the end of 2021. Also, as we recently discussed during a phone conversation, EPA agrees that a schedule should be developed that includes for periodic scoping meetings between the parties for the RI/FS (including the BRA) before the Draft RI is submitted.

If you have questions regarding the preceding, please contact me at (404) 562-8506 or pope.robert@epa.gov. Note that due to the EPA Region 4 response to the COVID-19 Coronavirus situation, hard copies of documents are difficult to receive, so it is requested that submittals be made by electronic methods as much as possible until the EPA Region 4 offices are fully re-opened.

Sincerely,

ROBERT POPE Digitally signed by ROBERT POPE
Date: 2020.08.14 11:52:13 -04'00'

Robert H. Pope, GS-14
Senior Remedial Project Manager
Restoration & Sustainability
Branch
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Enclosure

cc: Melanie S. Jablonski, Georgia Power
Stephen P. Gonzalski, BP Corporation
J. McNamara, GAEPD